

**EXHIBIT 5**

**UNREDACTED VERSION**

**OF DOCUMENT**

**SOUGHT TO BE SEALED**

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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 WAYMO LLC

14 Plaintiffs,

15 v.

16 UBER TECHNOLOGIES, INC.;  
17 OTTOMOTTO, LLC; OTTO TRUCKING  
18 LLC,

19 Defendants.

Case No. 17-cv-00939-JCS

**PLAINTIFF’S AMENDED FOURTH  
SUPPLEMENTAL OBJECTIONS AND  
RESPONSES TO UBER’S FIRST SET OF  
INTERROGATORIES (NOS. 1-11)**

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111	Pierre-Yves Droz, Daniel Gruver, Luke Wachter, Drew Ulrich, Gaetan Pennecot, Dorel Ionut Iordache, Anthony Levandowski, Will McCann
112	Pierre-Yves Droz
113	Pierre-Yves Droz, Sam Lenius
114	Pierre-Yves Droz, Blaise Gassend
115	Pierre-Yves Droz, Daniel Gruver
116	Pierre-Yves Droz, Mark Shand, Sam Lenius, Sean Noyce
117	Pierre-Yves Droz, Gaetan Pennecot
118	Pierre-Yves Droz, Blaise Gassend
119	Pierre-Yves Droz, Gaetan Pennecot
120	Pierre-Yves Droz, Gaetan Pennecot, Drew Ulrich, Dorel Ionut Iordache
121	Pierre-Yves Droz, Jonathan Dowdall, Christian Lauterbach

**INTERROGATORY NO. 6:**

Separately for each alleged Waymo trade secret identified in response to Interrogatory No. 1, describe how long it took and how much it cost to develop.

**RESPONSE TO INTERROGATORY NO. 6:**

Waymo incorporates by reference its General Objections. Waymo further objects to this interrogatory on the grounds that it is overbroad, unduly burdensome, and oppressive, including to the extent that it asks Waymo to respond “[s]eparately for each alleged Waymo trade secret.” Waymo further objects to this request to the extent it is compound, complex, and contains multiple subparts.

Subject to and without waiving the foregoing General and Specific Objections, Waymo responds as follows:

Waymo began developing its in-house LiDAR systems in 2011. Waymo’s development of its in-house LiDAR systems drew from development efforts of 510 Systems, led by engineer Pierre-Yves Droz. 510 Systems began developing a mapping LiDAR in 2009; by December 2010, these efforts had led to a prototype code-named “Little Bear” (“LBr”). In early summer 2011, 510 Systems began developing LiDAR systems for self-driving applications, building on the success of LBr. However, because of the different requirements for detecting objects at different distances that 510 Systems learned from its experience with LBr, 510 Systems proceeded with development

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1 of two distinct LiDAR designs: a LiDAR system for long ranges (“Papa Bear” or “PBr”) and a  
2 separate LiDAR system for medium ranges (“Mama Bear” or “MBr”). *See* Droz Decl. ¶¶ 5-7.

3 In July 2011, Waymo acquired 510 Systems. Since the acquisition, Waymo’s LiDAR  
4 team has grown from 6 people when Waymo acquired 510 Systems to approximately [REDACTED] people  
5 today. *Id.* ¶ 7.

6 In 2011, Waymo’s self-driving cars were using an off-the-shelf LiDAR device (the  
7 Velodyne HDL64), which cost approximately \$70,000. Waymo spent years working on a variety  
8 of possible LiDAR designs that proved not to work. Waymo’s experience with these “dead-end”  
9 designs helped lead Waymo to the architecture now at the heart of its current LiDAR systems. *Id.*  
10 ¶ 10-12.

11 Designing and developing LiDAR systems is a difficult and time-consuming process that  
12 requires significant experience with using LiDAR systems for the desired application — in  
13 Waymo’s case, self-driving cars. Thanks to Waymo’s experience with self-driving cars dating  
14 back to 2009, Waymo had the knowledge required for optimizing LiDAR for self-driving car test  
15 scenarios. Optimization is difficult and time-consuming, as [REDACTED]  
16 [REDACTED]. As discussed above, early on, Waymo  
17 realized that different LiDAR designs would be required to satisfy all the needed self-driving car  
18 test scenarios for different ranges.

19 For example, for long ranges, [REDACTED]  
20 [REDACTED]. Early development of PBr involved [REDACTED]  
21 [REDACTED] — a solution that did not  
22 work. After trying several other designs and building several different prototypes of Papa Bear,  
23 Waymo began equipping its fleet (in 2012) with version 5 of PBr, which was [REDACTED]  
24 [REDACTED] This limitation proved not to work for self-driving cars. Waymo  
25 thus iterated more designs of Papa Bear, eventually settling on the PBr design that it still uses on  
26 its self-driving fleet. Waymo is not aware of viable alternatives for long-range LiDAR. *See id.*  
27 ¶¶ 9-10.

28

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1 Development of Waymo’s mid-range LiDAR system was equally, if not more, difficult,  
2 time-consuming, and expensive than development of PBr. In parallel with PBr design, beginning  
3 in 2011, Waymo worked on MBr, which [REDACTED] After more  
4 than a year of work on MBr, however, this design proved not to be viable for use in self-driving  
5 cars. Accordingly, in late 2012, Waymo decided to abandon MBr and came up with an entirely  
6 new design for a mid-range LiDAR, codenamed “Grizzly Bear” (or “GBr”). *See id.* ¶ 11.

7 Beginning in December 2012, Waymo began devoting many resources into developing the  
8 mid-range GBr LiDAR. GBr was a very different and innovative design made possible by all the  
9 know-how and technological capabilities Waymo’s LiDAR team had developed over several years  
10 of working on LiDAR systems. In contrast to commercially available LiDAR systems, such as the  
11 Velodyne system originally used by Waymo, GBr had many advantages: [REDACTED]

12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED] *See id.*  
15 ¶ 12.

16 One of GBr’s innovations was a design that it eventually patented: its use of a single lens  
17 — rather than multiple sets of lenses — to both transmit and receive the collection of laser beams  
18 used to scan the surrounding environment. Traditionally, a multi-beam LiDAR system used lens  
19 assemblies with multiple elements (such as one lens for the transmit side and another for the  
20 receive side), but this approach was not practical in a self-driving car LiDAR because of the  
21 significant size and cost of the system due to the complexity of manufacturing numerous complex  
22 lens elements. *See id.* ¶¶ 13-14. Waymo first pioneered its single-lens design in GBr. GBr’s  
23 single-lens design makes the focal plane curved, complicating the optical layout. Accordingly,  
24 Waymo developed many innovations, some patented and some maintained as trade secrets, to deal  
25 with the more complicated optical layout and allowed Waymo to get the small-size and low-cost  
26 benefits of a single-lens system. *See id.* ¶ 15.

27 In mid 2013, Waymo rolled out the second generation of its mid-range LiDAR — GBr2.  
28 The GBr design (as refined in GBr2), was groundbreaking, as it significantly reduced the cost and

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1 size of the LiDAR system while increasing performance. To get to this point, it took Waymo two  
2 years from when it first set out to build an in-house mid-range LiDAR for self-driving car  
3 applications. Development of GBr2 required solving innumerable issues, which Waymo  
4 accomplished by devoting significant resources. The issues Waymo spent time and money  
5 resolving, and the solutions to those issues, are something a LiDAR designer not previously  
6 familiar with Waymo’s designs could not address in advance. *See id.* ¶¶ 17-18.

7 Through Waymo’s many months of design and development, Waymo finally switched  
8 from off-the-shelf Velodyne LiDAR systems to its in-house GBr2 LiDAR in late 2013 and early  
9 2014, almost three years after Waymo first started developing its in-house mid-range LiDAR and  
10 approximately one year after Waymo first came up with the single-lens concept for GBr. *See id.*  
11 ¶ 19.

12 Waymo’s mid-range LiDAR development did not stop then. It continued spending time  
13 and resources on improving GBr2, leading to the current-generation of Waymo’s mid-range  
14 LiDAR, known internally as GBr3, which adds innovations onto the same foundation as GBr and  
15 GBr2, including [REDACTED]  
16 These arrangements were designed — based on Waymo’s years of testing, simulation,  
17 experimentation, and optimization for different test scenarios — for use in self-driving cars.  
18 These designs result in GBr3 [REDACTED]

19 [REDACTED]  
20 [REDACTED] *See id.* ¶ 20.

21 Waymo spent much time, effort, and resources developing GBr3. As just one example,  
22 Waymo’s trade secret [REDACTED]

23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]  
26 [REDACTED]  
27 [REDACTED]  
28 [REDACTED]

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1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED] [REDACTED]  
4 [REDACTED]  
5 [REDACTED] See  
6 *id.* ¶ 21.

7 Building on these insights, Waymo spent enormous time, simulation, and resources to  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED] [REDACTED]  
12 [REDACTED]  
13 [REDACTED] See *id.*  
14 ¶ 22.

15 In brief, Waymo’s LiDAR development efforts led to the replacement of the Velodyne  
16 HDL64 with an in-house LiDAR solution that was one third the size and one tenth the cost.  
17 Waymo’s research and development efforts into LiDAR technology also led to the creation of a  
18 new type of LiDAR to cover long-range perception needs with [REDACTED]  
19 [REDACTED] as well as a low-cost short-range LiDAR with [REDACTED]  
20 [REDACTED] By 2015, Waymo’s test fleet was equipped exclusively with  
21 Waymo’s in-house LiDAR systems.

22 Even after the success of Waymo’s in-house LiDAR designs, Waymo’s LiDAR research  
23 and development efforts are ongoing and have led to additional innovations, many maintained as  
24 trade secrets, beyond those incorporated into its PBr, GBr, and TBr LiDARs. For example,  
25 Waymo’s extensive experience driving using a fleet equipped with its proprietary LiDAR systems  
26 (which recently surpassed a total of 3 million miles, with 1 million miles driven from October  
27 2016 to May 2017) has led Waymo to realize that [REDACTED]  
28 [REDACTED]

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1 [REDACTED]  
2 [REDACTED]  
3 These recent development efforts have resulted in several major improvements to  
4 Waymo’s technology, most or all of which are maintained as trade secrets. For example, [REDACTED]

5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
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12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]

15  
16 **FIRST SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 6:**

17 Waymo incorporates by reference its General Objections. Waymo further objects to this  
18 request to the extent it is compound, complex, and contains multiple subparts.

19 Subject to and without waiving the foregoing General and Specific Objections, Waymo  
20 responds as follows:

21 Waymo does not track “how long it took” and “how much it cost to develop” each of its  
22 trade secrets separately in the ordinary course of business. With respect to documents evincing  
23 how long it took to develop each of Waymo’s trade secrets, Waymo responds under Rule 33(d)  
24 and incorporates by reference its response to Interrogatory No. 4, 5, as well as any and all  
25 supplements thereto. In particular, Waymo intends to rely on those documents identified in  
26 response to Interrogatory No. 4 to, in part, show the time and cost to develop its asserted trade  
27 secrets. Waymo further intends to rely on knowledgeable witnesses identified in response to  
28 Interrogatory No. 5 to testify regarding these subjects. Additional information regarding



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1 Waymo’s response to this interrogatory can be found at WAYMO-UBER-00012830, WAYMO-  
2 UBER-00014506, WAYMO-UBER-00027045, WAYMO-UBER-00027046, WAYMO-UBER-  
3 00014489, WAYMO-UBER-00013348, WAYMO-UBER-00014078 and WAYMO-UBER-  
4 00026471.

5 **Trade Secrets 1, 2, 3, 4, 6 and 39**

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17 **Trade Secret 46**  
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23 Trade Secret 62  
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**Trade Secrets 75-80**

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28 **Trade Secret 91**

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4 **Trade Secret 85**  
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23 **Trade Secrets 81-84**  
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18 **Trade Secrets 86-88**

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**Trade Secrets 94-99 and 103**

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7 Trade Secret 104  
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12 Trade Secret 105  
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17 **Trade Secret 107**  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 Trade Secret 108

20 [REDACTED]

21 [REDACTED]

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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20 **Trade Secret 109**  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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18 Trade Secret 110  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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24 **Trade Secret 112**  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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22 [REDACTED]

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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**Trade Secret 113**

[REDACTED]

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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7 Trade Secret 118  
8 [REDACTED]  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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17 **Trade Secret 121**  
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27 [REDACTED]  
28 [REDACTED]



**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

1       **Trade Secrets 92 and 93**

2       [REDACTED]

3       [REDACTED]

4       [REDACTED]

5       [REDACTED]

6       [REDACTED]

7       [REDACTED]

8       [REDACTED]       [REDACTED]       [REDACTED]       [REDACTED]

9       [REDACTED]       [REDACTED]       [REDACTED]       [REDACTED]       [REDACTED]       [REDACTED]       [REDACTED]

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19       [REDACTED]

20       [REDACTED]

21       [REDACTED]

22       [REDACTED]

23       [REDACTED]

24       **Trade Secrets 9-10, 13-14, 38 and 117**

25       [REDACTED]

26       [REDACTED]

27       [REDACTED]

28       [REDACTED]

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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3 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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10 Trade Secret 48  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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14 Trade Secret 120  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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12 Trade Secret 111  
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28 [REDACTED]

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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3 [REDACTED]

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8 [REDACTED] [REDACTED]

9 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 Trade Secrets 101 and 102

16 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

17 [REDACTED]

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19 [REDACTED]

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21 [REDACTED]

22 [REDACTED] [REDACTED] [REDACTED] [REDACTED]

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

1 [REDACTED]

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9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 Trade Secrets 7-8, 16, 19-20 and 43

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 Trade Secret 49

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

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26 [REDACTED]

27 [REDACTED]

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

1 [REDACTED]

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7 **Trade Secret 15**

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 **Trade Secret 17**

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 **Trade Secret 42**

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

26 [REDACTED]

27 [REDACTED]

28 **Trade Secrets 63 and 89**

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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[REDACTED]

**Trade Secret 114**

[REDACTED]

**Trade Secret 115**

[REDACTED]

**Trade Secret 116**

[REDACTED]

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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4 [REDACTED]

**SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 6:**

7 Waymo incorporates by reference its General Objections. Waymo further objects to this  
8 request to the extent it is compound, complex, and contains multiple subparts.

9 Subject to and without waiving the foregoing General and Specific Objections, Waymo  
10 responds as follows:

11 Waymo does not track “how long it took” and “how much it cost to develop” each of its  
12 trade secrets separately in the ordinary course of business. With respect to documents evincing  
13 how long it took to develop each of Waymo’s trade secrets, Waymo responds under Rule 33(d)  
14 and incorporates by reference its response to Interrogatory No. 4, 5, as well as any and all  
15 supplements thereto. In particular, Waymo intends to rely on those documents identified in  
16 response to Interrogatory No. 4 to, in part, show the time and cost to develop its asserted trade  
17 secrets. Waymo further intends to rely on knowledgeable witnesses identified in response to  
18 Interrogatory No. 5 to testify regarding these subjects. Additional information regarding  
19 Waymo’s response to this interrogatory can be found at WAYMO-UBER-00012830, WAYMO-  
20 UBER-00014506, WAYMO-UBER-00027045, WAYMO-UBER-00027046, WAYMO-UBER-  
21 00014489, WAYMO-UBER-00013348, WAYMO-UBER-00014078 and WAYMO-UBER-  
22 00026471.

**Trade Secret 1**

23 [REDACTED]  
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27 [REDACTED]  
28 [REDACTED]

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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6 Trade Secret 2  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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16 **Trade Secret 3**  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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26 Trade Secret 4  
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25 [REDACTED] [REDACTED]  
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27 [REDACTED]  
28 [REDACTED]



**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

1 [REDACTED]

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6 [REDACTED]

7 [REDACTED]

8 **Trade Secret 6**

9 [REDACTED]

10 [REDACTED]

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12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

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19 [REDACTED]

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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13 Trade Secret 75

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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13 Trade Secret 91  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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15 Trade Secret 85  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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6 Trade Secret 81  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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**Trade Secret 82**

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**Trade Secret 83**

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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15 Trade Secret 86  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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26 Trade Secret 90  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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12 Trade Secret 96  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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25 Trade Secret 99  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

**Trade Secret 103**

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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6 Trade Secret 104  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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11 **Trade Secret 105**  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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13 Trade Secret 106  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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16 **Trade Secret 107**  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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18 Trade Secret 108  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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20 **Trade Secret 109**  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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18 **Trade Secret 110**  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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24 **Trade Secret 112**  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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8 [REDACTED]

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11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

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21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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**Trade Secret 113**

[REDACTED]

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

1 [REDACTED]  
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4 [REDACTED]  
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6 [REDACTED]  
7 **Trade Secret 118**  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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11 [REDACTED]  
12 Trade Secret 119  
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14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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11 [REDACTED]  
12 [REDACTED]  
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15 [REDACTED]  
16 [REDACTED]  
17 **Trade Secret 121**  
18 [REDACTED] [REDACTED]  
19 [REDACTED]  
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21 [REDACTED] [REDACTED]  
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28 [REDACTED]

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

1       **Trade Secret 92**

2       [REDACTED]

3       [REDACTED]

4       [REDACTED]

5       [REDACTED]

6       [REDACTED]

7       [REDACTED]

8       [REDACTED]

9       [REDACTED]

10       [REDACTED]

11       [REDACTED]

12       [REDACTED]

13       [REDACTED]

14       [REDACTED]

15       [REDACTED]

16       [REDACTED]

17       [REDACTED]

18       [REDACTED]

19       [REDACTED]

20       [REDACTED]

21       [REDACTED]

22       [REDACTED]

23       **Trade Secret 93**

24       [REDACTED]

25       [REDACTED]

26       [REDACTED]

27       [REDACTED]

28       [REDACTED]

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

1 [REDACTED]

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7 [REDACTED]

8 [REDACTED]

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12 [REDACTED]

13 [REDACTED]

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15 [REDACTED]

16 [REDACTED]

17 **Trade Secret 9**

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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24 [REDACTED]  
25 [REDACTED]  
26 Trade Secret 10  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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7 Trade Secret 13  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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17 [REDACTED]  
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19 Trade Secret 14  
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21 [REDACTED]  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

1 [REDACTED]  
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4 Trade Secret 38  
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7 [REDACTED]  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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12 [REDACTED]  
13 Trade Secret 117  
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16 [REDACTED]  
17 [REDACTED]  
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27 [REDACTED]  
28 [REDACTED]

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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25 **Trade Secret 48**  
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28 [REDACTED]

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

26 [REDACTED]

27 [REDACTED]

28 [REDACTED]

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

**Trade Secret 120**

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5					0

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**Trade Secret 111**

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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26 [REDACTED]  
27 [REDACTED]  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

1 [REDACTED]  
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3 [REDACTED]  
4 **Trade Secret 101**  
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23 [REDACTED] [REDACTED]  
24 [REDACTED]  
25 [REDACTED]  
26 [REDACTED]  
27 [REDACTED]  
28 [REDACTED]



**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

1       **Trade Secret 102**

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3       [REDACTED]

4       [REDACTED]

5       [REDACTED]

6       [REDACTED]       [REDACTED]

7       [REDACTED]       [REDACTED]

8       [REDACTED]       [REDACTED]       [REDACTED]       [REDACTED]       [REDACTED]

9       [REDACTED]       [REDACTED]

10       [REDACTED]

11       [REDACTED]

12       [REDACTED]

13       [REDACTED]

14       [REDACTED]

15       [REDACTED]

16       [REDACTED]

17       [REDACTED]

18       [REDACTED]

19       [REDACTED]

20       [REDACTED]       [REDACTED]

21       [REDACTED]

22       [REDACTED]

23       [REDACTED]

24       [REDACTED]

25       **Trade Secret 7**

26       [REDACTED]

27       [REDACTED]

28       [REDACTED]

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

1 [REDACTED]  
2 [REDACTED]  
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21 **Trade Secret 8**  
22 [REDACTED] [REDACTED]  
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27 [REDACTED] [REDACTED] [REDACTED]  
28 [REDACTED]

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

1 [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
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18 Trade Secret 16  
19 [REDACTED]  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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15 **Trade Secret 19**  
16 [REDACTED]  
17 [REDACTED] [REDACTED]  
18 [REDACTED] [REDACTED]  
19 [REDACTED]  
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28 [REDACTED]

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 Trade Secret 20

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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10 [REDACTED]  
11 Trade Secret 43  
12 [REDACTED]  
13 [REDACTED]  
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**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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7 **Trade Secret 49**  
8 [REDACTED]  
9 [REDACTED]  
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11 [REDACTED]  
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16 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
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28 [REDACTED]

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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**Trade Secret 15**

[REDACTED]

**Trade Secret 17**

[REDACTED]

**Trade Secret 42**

[REDACTED]

**Trade Secret 63**

[REDACTED]



**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

1       **Trade Secret 89**

2       [REDACTED]

3       [REDACTED] [REDACTED]

4       [REDACTED]

5       [REDACTED]

6       [REDACTED] [REDACTED]

7       [REDACTED]

8       [REDACTED]

9       **Trade Secret 114**

10       [REDACTED]

11       [REDACTED]

12       [REDACTED]

13       [REDACTED]

14       [REDACTED]

15       [REDACTED] [REDACTED]

16       [REDACTED]

17       **Trade Secret 115**

18       [REDACTED]

19       [REDACTED]

20       [REDACTED]

21       [REDACTED]

22       [REDACTED]

23       [REDACTED] [REDACTED]

24       [REDACTED]

25       **Trade Secret 116**

26       [REDACTED]

27       [REDACTED]

28       [REDACTED]

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]

6  
7 **THIRD SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 6:**

8 Waymo incorporates by reference its prior Response to Interrogatory No. 6, including  
9 objections.

10 Waymo further responds as follows:

11 **Trade Secret 25**

12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
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28 [REDACTED]

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 Trade Secret 72  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]  
26 [REDACTED]  
27 [REDACTED]  
28 [REDACTED]

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

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28 [REDACTED]

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]

4  
5 **INTERROGATORY NO. 7:**

6 Separately for each alleged Waymo trade secret identified in response to Interrogatory No.  
7 1, identify all efforts to maintain the secrecy and confidentiality of the trade secret.

8  
9 **RESPONSE TO INTERROGATORY NO. 7:**

10 Waymo incorporates by reference its General Objections. Waymo further objects to this  
11 interrogatory on the grounds that it is overbroad, unduly burdensome, and oppressive, including to  
12 the extent that it asks Waymo to respond separately for each alleged Waymo trade secret. Waymo  
13 further objects to this request to the extent it is compound, complex, and contains multiple  
14 subparts.

15 Subject to and without waiving the foregoing General and Specific Objections, Waymo  
16 responds as follows:

17 Waymo hereby incorporates by reference its List of Asserted Trade Secrets, Dkt. No. 25-7,  
18 and the Declarations of Michael Janosko (Janosko Decl.), Gary Brown (“Brown Decl.”), and  
19 Pierre-Yves Droz (Droz Decl.), all of which describe Waymo’s efforts to maintain secrecy of its  
20 trade secrets.

21 In addition, Waymo provides the following response:

22 Waymo takes robust measures to protect its LiDAR trade secrets. Waymo enforces an  
23 employee code of conduct that explains employees’ strict obligations to maintain the secrecy of  
24 confidential information, and requires employee training in security procedures. Droz Decl. ¶ 30.

25 Waymo also takes reasonable measures to mark confidential and proprietary information,  
26 such as documents and other materials, with visible legends designating them as such when  
27 sharing them outside of Waymo, subject to NDAs or other confidentiality agreements.  
28 Disclosures to vendors are limited to the subject matter necessary for the vendor’s engagement and

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

**VERIFICATION**

I, Shana Stanton, declare:

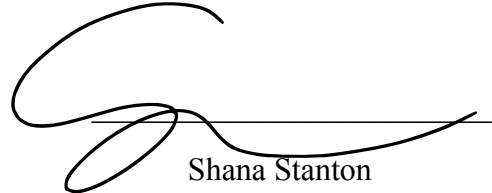
1. I am a Senior Litigation Counsel at Google, and working on secondment to Plaintiff Waymo LLC (“Waymo”). I am authorized to execute this verification on behalf of Waymo.

2. I have read Waymo’s Amended Fourth Supplemental Objections And Responses To Uber’s First Set Of Interrogatories (Nos. 1-11) (the “Responses”), and know the contents thereof.

3. I am informed and believe that the matters stated in the Responses are true and correct and, on that ground, allege that the matters stated therein are true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 9th day of November, 2017, at San Francisco, California.



Shana Stanton